

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MECHANICAL LICENSING COLLECTIVE,

Plaintiff,

v.

PANDORA MEDIA, LLC,

Defendant.

Civil Action No. 3:24-cv-00168

District Judge Eli J. Richardson

Magistrate Judge Jeffrey S. Frensley

JURY DEMAND

**STIPULATION AND [PROPOSED] ORDER REGARDING MODIFICATION OF
DEADLINES IN INITIAL CASE MANAGEMENT ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiff Mechanical Licensing Collective (“The MLC”) and Defendant Pandora Media, LLC (“Pandora”), by and through their respective counsel of record (together, the “Parties”), as follows:

1. WHEREAS, on May 24, 2024, Magistrate Judge Frensley entered an Initial Case Management Order (ECF No. 33).

2. WHEREAS, on May 28, 2024, Judge Richardson entered an Order setting this case for trial and establishing pretrial deadlines (ECF No. 34) (the “Scheduling Order”).

3. WHEREAS, on October 16, 2024, following a Case Management Conference, Magistrate Judge Frensley entered an Order (1) granting the Parties’ requested extensions to the deadlines in the Initial Case Management Order and (2) recommending that Judge Richardson grant the Parties’ requested extensions to the deadlines in the Scheduling Order (ECF No. 40) (the “Revised CMO”).

4. WHEREAS, on October 17, 2024, Judge Richardson entered an Order resetting this case for trial and granting the Parties' requested extensions to the deadlines in the Scheduling Order (ECF No. 41) (the "Revised Scheduling Order").

5. WHEREAS, the Parties have complied with all deadlines set forth in the Initial Case Management Order, as modified by the Revised CMO, and in the Revised Scheduling Order.

6. WHEREAS, the Parties are presently in fact discovery and intend to depose a number of fact witnesses following the completion of their respective document productions.

7. WHEREAS, the Parties have produced and are continuing to produce documents on a rolling basis, and anticipate that their respective document productions will be completed by the end of this month.

8. WHEREAS, given the currently set deadline for fact discovery of January 31, 2025, the Parties have conferred and mutually agreed that additional time will be necessary to review the additional forthcoming productions and conduct and complete depositions.

9. WHEREAS, the Parties have agreed to stipulate to the requested modification of the Initial Case Management Order and Revised CMO such that the Parties will have until: (1) January 31, 2025, for the completion of party document productions; (2) March 14, 2025, for the completion of fact discovery, including depositions; (3) March 21, 2025, for the filing of discovery motions, if any; and (4) March 28, 2025, for the filing of a Case Resolution Plan and Joint Status Report.

10. WHEREAS, the Parties do not seek modification of any other deadlines set forth in the Initial Case Management Order, as modified by the Revised CMO, nor do they seek modification of any trial or pretrial deadlines set forth in the Revised Scheduling Order.¹

11. WHEREAS, except for the modifications provided in this Stipulation and [Proposed] Order, all other provisions of the Initial Case Management Order, as modified by the Revised CMO, remain in full force and effect.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, through their respective undersigned counsel of record, and subject to the approval of the Court, that the Court modify the deadlines in the Initial Case Management Order, as modified by the Revised CMO, as follows:

Event	Current Deadline	[Proposed] New Deadline
Completion of Party Document Productions	N/A	January 31, 2025
Completion of Fact Discovery	January 31, 2025	March 14, 2025
Discovery Motions	February 21, 2025	March 21, 2025
Case Resolution Plan/ Joint Status Reports	March 21, 2025	March 28, 2025
Expert Disclosure and Affirmative Reports	April 24, 2025	April 24, 2025 (<i>No change</i>)
Rebuttal Expert Reports	May 23, 2025	May 23, 2025 (<i>No change</i>)
Expert Depositions	June 13, 2025	June 13, 2025 (<i>No change</i>)
Dispositive Motions	June 27, 2025 (Moving) July 25, 2025 (Response) August 8, 2025 (Reply)	June 27, 2025 (Moving) July 25, 2025 (Response) August 8, 2025 (Reply) (<i>No change</i>)

[Remainder of page intentionally left blank]

¹ The Parties' requested modification of the Initial Case Management Order will not affect its conformity with the requirements of LR 16.01(h)(1), as the Parties do not seek to extend or otherwise modify the current deadline for reply papers in support of dispositive motions or the trial date as reset by Judge Richardson.

IT IS SO STIPULATED.

Dated: January 16, 2025

Respectfully submitted,

/s/ Lauren Kilgore

Lauren Kilgore (TN Bar No. 30219)
Jacob T. Clabo (TN Bar No. 36760)
BUCHALTER, PC
1 Music Circle South, Suite 300
Nashville, TN 37203
P: (629) 305-96750
lkilgore@buchalter.com
jclabo@buchalter.com

Benjamin K. Semel (admitted *pro hac vice*)
M. Mona Simonian (admitted *pro hac vice*)
Joshua Weigensberg (N.Y. Bar No. 4894929)
Susannah G. Price (admitted *pro hac vice*)
PRYOR CASHMAN LLP
7 Times Square
New York, New York 10036
Phone: (212) 326-0181
Fax: (212) 798-6326
bsemel@pryorcashman.com
msimonian@pryorcashman.com
jweigensberg@pryorcashman.com
sprice@pryorcashman.com

Attorneys For Plaintiff
Mechanical Licensing Collective

/s/ Michael Abelow

Michael G. Abelow (No. 026710)
Micah N. Bradley (No. 38402)
SHERRARD ROE VOIGT & HARBISON
1600 West End Ave., Suite 1750
Nashville, TN 37203
Tel: (615) 742-4532
Fax: (615) 742-4539
mabelow@srvhlaw.com
mbradley@srvhlaw.com

Benjamin E. Marks (admitted *pro hac vice*)
Todd Larson (admitted *pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue, 32nd Fl.
New York, NY 10153
Tel: (212) 310-8000
Benjamin.Marks@weil.com
Todd.Larson@weil.com

Crystal L. Weeks (admitted *pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
2001 M Street, NW, Suite 600
Washington, DC 20036
Phone: (202) 682-7516
Fax: (202) 857-0940
Crystal.Weeks@weil.com

Attorneys for Defendant
Pandora Media, LLC

IT IS SO ORDERED.

Dated: _____

Honorable Jeffrey S. Frensley
United States Magistrate Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document has been filed with the Court's electronic filing system, which will serve a copy on all counsel of record.

This 16th day of January 2025.

/s/ Lauren Kilgore
Lauren Kilgore